

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 14-CR-10230-NMG
)	
LAWRENCE J. COSTELLO,)	
Defendant.)	

UNITED STATES' MOTION FOR PRELIMINARY ORDER OF FORFEITURE
FOR SUBSTITUTE ASSETS IN PARTIAL SATISFACTION
OF MONEY JUDGMENT

The United States of America, by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, respectfully moves this Court for the issuance of a Preliminary Order of Forfeiture for Substitute Assets in Partial Satisfaction of Money Judgment in the above-captioned case pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), and Rule 32.2(b) of the Federal Rules of Criminal Procedure. A proposed Preliminary Order of Forfeiture for Substitute Assets in Partial Satisfaction of Money Judgment is submitted herewith. In support thereof, the United States sets forth the following:

1. On July 31, 2014, a federal grand jury sitting in the District of Massachusetts returned a one-count Indictment charging defendant Lawrence J. Costello (the "Defendant") with Bank Robbery, in violation of 18 U.S.C. §§ 2113(a) and (d) (Count One).

2. The Indictment also contained a forfeiture allegation, pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), which provided notice that the United States sought the forfeiture, upon conviction of the Defendant of the offense alleged in Count One of the Indictment, of any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense.

3. The Indictment further provided that, if any of the above-described forfeitable

Motion allowed. JSM/Gorton, USDJ 6/21/16